

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
EXECUTIVE OFFICE OF THE MAYOR



Office of the City Administrator

May 16, 2007

Monica Harvey  
State Air Pollution Control Board  
Virginia Department of Environmental Quality  
629 East Main Street  
P.O. Box 1105  
Richmond, VA 23218

**Re: Comments on Draft Consent Orders and Draft Operation Permits for  
Mirant Potomac River Generating Station**

Dear Ms. Harvey:

It has come to my attention that the State Air Pollution Control Board is considering various options concerning the future operation of the Potomac River Generating Station (PRGS) in Alexandria, Virginia. As you know, operation of this plant has a direct impact on the reliability of electricity for the Nation's Capital.

We understand that the plant currently operates under an administrative compliance order between Mirant and the US Environmental Protection Agency (EPA) that will expire on June 1, 2007. It is also our understanding that there is a standing order from the federal Department of Energy (DOE) that directs Mirant to operate under emergency conditions through July 1, 2007. Therefore it is important that you consider and approve an option that allows for the plant to run in a manner that ensures that both environmental and reliability goals are met. This is especially true for this summer, when transmission line work is being conducted by our local utility, Pepco.

Critical areas of the District of Columbia are dependent on the electricity generated from this facility. It is my understanding that current reserve capacity for electricity in the greater Washington is below acceptable industry standards. Recent population growth and increased demand for electricity has placed tremendous pressure on existing electricity infrastructure. In addition, little additional generating capacity has been built in our area while demand continues to rise. This dynamic places a premium value on existing generating facilities.

The District wishes to register its concern over the possible actions of the Air Board that might restrict operations at the plant to a level that would threaten the continued operation of the PRGS. Our understanding is that three proposed operating permits and one proposed consent order offered by the City of Alexandria would restrict PRGS from meeting the requirements under the DOE order that would ensure reliable electricity in the District of Columbia. In contrast, we understand that a proposed consent order, agreed to by Virginia's own Department of Environmental Quality and Mirant, would allow the plant to run in compliance with

environmental requirements while ensuring continued, consistent availability of electricity to the District of Columbia.

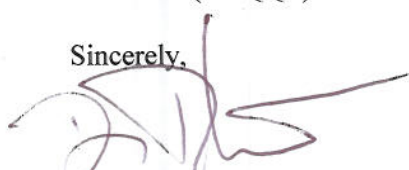
As you may know, PRGS provides electricity to the communities of Georgetown, Foggy Bottom - including the Metro Station that serves both the Blue and Orange lines - the Mall along Constitution Avenue, major portions of downtown DC, FBI headquarters, the Justice Dept., the State Department, FEMA, the Dept of Interior, the Department of Energy, hospitals, schools, universities, commercial buildings, fire stations and police stations. The plant also supplies electricity to the Blue Plains Advanced Wastewater Treatment Plant that services the District as well as areas in northern Virginia.

Unless PRGS has the authority to operate at full level, as directed by PJM, when necessary, all of the District assets listed above are at risk of being without electricity for extended periods. This is especially true in the summer months when demand is at its highest.

We understand and appreciate the important role that the Air Board plays in monitoring air quality and maintaining high standards for emissions. While we believe that the Potomac River Plant should be required to meet all applicable state and federal standards in terms of emissions and general operations, it is unacceptable to impose unrealistic restrictions on the operation of an essential facility or to place conditions on the facility that make it economically unviable to continue to operate.

We ask that you and the members of the Air Board understand that the decisions that you will make on this matter impact the entire region. We believe that the board should consider a compromise along the lines of what has been recommended by DEQ staff, provided that the operating conditions can demonstrate compliance with the National Ambient Air Quality Standards (NAQQS) as set forth by the EPA.

Sincerely,



Dan Tangherlini  
City Administrator

cc. Richard D. Langford, Chairman  
Bruce C. Buckheit, Member  
John N. Hanson, Member  
Hullihen Williams Moore, Member  
Vivian E. Thomson, Member  
David Paylor, Director, Virginia Department of Environmental Quality